



9/17/01

September 17, 2001

Mr. Fred Micke, On-Scene Coordinator
Ms. Verneta Simon, On-Scene Coordinator
U. S. Environmental Protection Agency
Region 5
77 West Jackson Blvd., SE-5J
Chicago, Illinois 60604

EPA Region 5 Records Ctr.



227587

RE: Assistance in Expediting Utility Review/Response - STS Project No. 1-25585-XG,
Correspondence No. 008

Dear Mr. Micke and Ms. Simon:

The removal project at the above-referenced site is nearing the start of the field work. That field work includes excavating to remove radiologically impacted soil for off-site disposal. Additionally, the project includes a closely spaced drilling program to explore for the presence of impacted soil around the margins of the site, and possibly an earth retention system that may be required along portions of the site perimeter. Within the City of Chicago, excavations to depths greater than 12 feet require review by the Board of Underground, those utilities with subsurface facilities that may be put at risk by subsurface work. This review includes a collection of information step that has been completed, and a protection of utilities step where the specific work scope is reviewed to identify potential impacts. This second step is currently in progress.

The concern we have is the review process takes on the order of 30 to 60 days. This delay could interfere with our excavation and/or drilling schedule. Of specific concern is the drilling program. The drilling program will seek to locate impacted soil located at the site margins, which might require some sort of earth retention system to allow the soil to be excavated. The retention system would, therefore, not be started in final design or installation until after the drilling had encountered the impacted material, if it is present.

The drilling is entirely within the site boundaries, and the borings that remain to be drilled are limited to the east end of the site. The information submitted to the Board of Underground shows the locations for the several hundred borings proposed. The borings already completed to the west were all less than 12 feet deep.

By this letter, we are requesting USEPA assistance in obtaining a waiver from the Board of Underground review process in accordance with the Superfund provision regarding permit

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waivers for work on CERCLA sites that is in substantial compliance with permit requirements. Alternatively, we would request your assistance in expediting the review process to shorten the 30- to 60-day timeframe.

Please contact us with any assistance you can offer regarding this matter.

Regards,

STS CONSULTANTS, LTD.



Julie Apolinario
Senior Project Scientist



Richard G. Berggreen, C.P.G.
Principal Geologist

cc: Narendra Prasad, Chicago Department of Environment